

UNITED STATE BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON

In re:

Gayl Ann Beller

Debtor

No: 23-10979-MLB

APPLICATION FOR
LEAVE TO APPEAR PRO HAC VICE
AND STATEMENT OF LOCAL COUNSEL

APPLICATION FOR PRO HAC VICE APPEARANCE

Pursuant to Local Civil Rule 83.1(d) of the United States District Court for the Western District of Washington, Anthony J. Napolitano hereby applies for permission to participate as counsel in the above-entitled bankruptcy action on behalf of the following party or parties: Guy Foresman.

The particular need for my appearance and participation is: to represent, Guy Foresman, who is one of the suspended co-trustees and beneficiaries of the Foresman General Trust. The Debtor is also a suspended co-trustee and beneficiary of the Foresman General Trust.

I, Anthony J. Napolitano, understand that I am charged with knowing and complying with all applicable rules, including, but not limited to, Local Civil Rule 83.1 of the United States District Court for the Western District of Washington, which requires that I associate with local counsel who shall sign all pleadings prior to filing, and the Local Rules of Bankruptcy Procedure of the Western District of Washington ("LBR"), including LBR 5005-1 which governs electronic filing. I further understand that this application, and my association with local counsel, pertains to the above-captioned matter only. My appearance and participation in other bankruptcy or adversary proceedings before this Court will require a separate pro hac vice application.

I have not been disbarred or formally censured by a court of record or by a state bar association. There are no pending disciplinary proceedings against me. I am in good standing with the bar of the State of California.

1 With this application I will tender the applicable pro hac vice fee to the Office of the Clerk of the
2 Bankruptcy Court via electronic payment.

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4 I declare under penalty of perjury that the foregoing is true and correct.

5 DATED: July 28, 2023

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7 Signature of Applicant Attorney

8 Applicant's Name: Anthony J. Napolitano

9 Bar # 227691

State: California

10 Applicant's Law Firm:

Buchalter, P.C.

11 Applicant's Address:

1000 Wilshire Boulevard, Suite 1500, Los Angeles, CA 90017

12
13 Telephone No:

213.891.0700

14 E-mail address:

anapolitano@buchalter.com

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16 STATEMENT OF LOCAL COUNSEL

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18 I am familiar with the responsibilities of local counsel as set forth in the Local Rules, W.D. Wash.
19 LCR 83.1(d). I am authorized and will be prepared to handle the above-captioned matter, up to and
20 including trial, in the event the applicant, is unable to be present upon any date assigned by the court.
21 If this application is filed electronically, I understand that the provisions of LBR 5005-1(d)(3) apply and
22 that I am required to retain documentation evidencing the signature of the applicant. I further understand
23 that my obligations as local counsel extend to the above-captioned matter only and that the applicant
24 attorney is required to file an additional pro hac application for appearance and participation in any
25 other bankruptcy or adversary proceedings before this Court.

26 DATED: July 28, 2023

/s/ John B. Crosetto

27 Signature of Local Counsel
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1 Local Counsel Name & WSBA Bar ID Number: John B. Crosetto (WSBA 36667)
2 Local Counsel Law Firm: Buchalter, P.C.
3 Local Counsel Address: 1420 5th Avenue, Suite 3100, Seattle, WA 98101
4 Local Counsel E-mail address: jcrosetto@buchalter.com
5 Telephone No: 206.319.7063